

To: Judge Meisel
Bankruptcy Court

RE: 18-33326-SLM
Lubos Naprstek
Motion to Lift Automatic Stay

To Judge Meisel

I am writing this letter to you in hopes of getting a continuance for the Motion to Lift Stay that I did answer back in February 2019.

I am in the process of loan modification and am willing to file a Motion for Mediation and resubmit everything if need be. I would like the time needed to process the modification and resolve this peacefully. I have let go of my current attorney Attorney David Russo and sought the help of another one who cannot enter the case until Russo has filed to remove himself. I was the understanding that Attorney Russo was going to resolve this last month to no avail as you can see.

Can you please consider continuing the hearing for Motion to Lift the Stay?

Sincerely,



Lubos Naprstek - Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

LUBOS NAPRSTEK
CONTINOUS FOR MOTION TO LIFT THE
AUTOMATIC STAY

U.S. BANKRUPTCY COURT
FILED
APR 05 2019

2019 APA - S P 1:48

JENNIFER A. NAUGHTON

BY CLERK
CLERK

In Re:

Motion to Lift The Automatic Stay for Real Property

Case No.: 18-33326-SLM

Adv. No.: _____

Chapter: 13

Hearing Date: 4/10/2019

Judge: Stacey L. Meisel

ADJOURNMENT REQUEST FOR CHAPTER 13

1. I, LUBOS NAPRSTEK,

am the attorney for: _____

am self-represented

Phone number: 917.204.4189

Email address: lnaprs@hotmail.com

2. I request an adjournment of the following hearing:

Matter: MOTION TO LIFT THE AUTOMATIC STAY

Current hearing date and time: 4/10/2019

New date requested: 6/13/2019

Reason for adjournment request: LOAN MODIFICATION IN PROCESS

3. I request an adjournment of **Motion to Lift the Automatic Stay**

Current Hearing date and time: 4/10/2019

New date requested: n/a

Reason for adjournment request: loan modification is in process

Trustee payments are current through April

The meeting of creditors under § 341(a) of the Code was conducted was not conducted

4. Consent to adjournment:

I have the consent of all parties. I do not have the consent of all parties (explain below): Cannot reach the attorney for the bank to resolve this peacefully and submit proof of loan modification docs

I certify under penalty of perjury that the foregoing is true.

Date: 4/5/2019


Signature

Pursuant to D.N.J. LBR 5071-1(b) an adjournment request must be made not later than 3 days before the hearing.

OFFICIAL USE ONLY:

The request for adjournment is:

Granted New hearing date: _____ Peremptory

Granted over objection(s) New hearing date: _____ Peremptory

Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.

rev.10/1/15